

## **Exhibit 49**

CONFIDENTIAL  
Anne Munksgaard – June 9, 2021

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
MASTER DOCKET 18-MD-2865 (LAK)  
CASE NO. 18-CV-09797

-----  
IN RE: )  
 )  
 )  
CUSTOMS AND TAX ADMINISTRATION OF )  
THE KINGDOM OF DENMARK )  
(SKATTEFORVALTNINGEN) TAX REFUND )  
SCHEME LITIGATION )  
 )  
 )  
-----

\*\*\*\*\*  
\* \*  
\* CONFIDENTIAL \*  
\* \*  
\*\*\*\*\*

VIDEO DEPOSITION OF  
ANNE MUNKSGAARD  
Copenhagen, Denmark  
Wednesday, June 9, 2021  
12:02 p.m. (CEST)

Reported by: CHRISTINE MYERLY

**CONFIDENTIAL**  
Anne Munksgaard – June 9, 2021

31 (Pages 118 to 121)

Page 118	Page 119
<p>1 scheme was illegal, is that right?</p> <p>2 MR. OXFORD: Object to the form.</p> <p>3 A So, I did not personally find out,</p> <p>4 no, but it did stop immediately thereafter.</p> <p>5 Q SKAT stopped the spreadsheet</p> <p>6 scheme of processing withholding tax because it</p> <p>7 determined that that means of paying out dividend</p> <p>8 withholding tax was illegal, correct?</p> <p>9 MR. OXFORD: Object to the form.</p> <p>10 A I can't remember. What I do</p> <p>11 remember is that the scheme was stopped because of</p> <p>12 related uncertainties.</p> <p>13 Q You understand the reclaim</p> <p>14 applications in this case were made using the form</p> <p>15 scheme and not the spreadsheet scheme, correct?</p> <p>16 A That is correct.</p> <p>17 Q With respect to the form scheme,</p> <p>18 you learned that SKAT approved claims as long as</p> <p>19 the information on the form was properly filled out,</p> <p>20 right?</p> <p>21 MR. OXFORD: Object to the form. Asked</p> <p>22 and answered.</p> <p>23 A That is how it has been most of</p> <p>24 the time, yes.</p> <p>25 Q You learned that SKAT had</p>	<p>1 warned -- had been warned repeatedly of the</p> <p>2 possibility that it could pay refunds to applicants</p> <p>3 who SKAT did not believe were entitled to receive</p> <p>4 them, correct?</p> <p>5 MR. OXFORD: Object to the form.</p> <p>6 (Court reporter clarification.)</p> <p>7 A I was not warned about anything, I</p> <p>8 am not sure I understand the question.</p> <p>9 Q Sorry. You learned that SKAT had</p> <p>10 been warned of the possibility that it could be</p> <p>11 paying out erroneous refunds before 2015, correct?</p> <p>12 MR. OXFORD: Objection to form.</p> <p>13 A Are you still referring to the SIR</p> <p>14 reports?</p> <p>15 BY MR. DULBERG:</p> <p>16 Q The SIR reports, other warnings,</p> <p>17 yes.</p> <p>18 A So, we are not talking about</p> <p>19 pressing the big warning button or anything like</p> <p>20 this. As I remember it, it was about a -- maybe a</p> <p>21 lack of control or that our routines were somewhat</p> <p>22 lacking. It wasn't like a general thing.</p> <p>23 Q The dividend withholding tax</p> <p>24 administration was characterized by a lack of</p> <p>25 controls, true?</p>
<p style="text-align: center;">Page 120</p> <p>1 MR. OXFORD: Objection to form.</p> <p>2 A Again, you are asking me questions</p> <p>3 that is outside the parameters of my job.</p> <p>4 BY MR. DULBERG:</p> <p>5 Q Do you agree with my statement?</p> <p>6 MR. OXFORD: Object to the form.</p> <p>7 A It has nothing to do with my job.</p> <p>8 So I don't think it is appropriate to ask.</p> <p>9 BY MR. DULBERG:</p> <p>10 Q I am asking, and you have to give</p> <p>11 me your best answer.</p> <p>12 MR. OXFORD: Object to the form. You can</p> <p>13 answer the question to the extent you understand it</p> <p>14 and feel like you have a basis to answer.</p> <p>15 A I don't feel that I have a basis</p> <p>16 from which to answer.</p> <p>17 Q Do you understand that</p> <p>18 Rigsrevisionen has concluded that SKAT had</p> <p>19 significant control deficiencies before 2015?</p> <p>20 MR. OXFORD: Object to the form.</p> <p>21 THE INTERPRETER: I'm sorry, did you ask</p> <p>22 her whether she understood or agreed?</p> <p>23 MR. DULBERG: Yes, I said do you</p> <p>24 understand that Rigsrevisionen has concluded that</p> <p>25 SKAT had significant control deficiencies before</p>	<p style="text-align: center;">Page 121</p> <p>1 2015.</p> <p>2 A Are you asking me whether I</p> <p>3 understand because it is written that this is their</p> <p>4 conclusion or whether this is my opinion?</p> <p>5 Q Right now I am just asking if you</p> <p>6 are aware of their conclusion which they drew in</p> <p>7 2016.</p> <p>8 MR. OXFORD: Objection to form.</p> <p>9 A I am familiar with their</p> <p>10 conclusion, yes.</p> <p>11 BY MR. DULBERG:</p> <p>12 Q And now I am asking whether you</p> <p>13 have any basis to disagree with that conclusion.</p> <p>14 MR. OXFORD: Objection to form. Asked and</p> <p>15 answered. You can answer it again if you have the</p> <p>16 basis to do so.</p> <p>17 A I don't feel I have a basis from</p> <p>18 which to answer.</p> <p>19 BY MR. DULBERG:</p> <p>20 Q So you don't agree or disagree</p> <p>21 with the conclusion of the national audit office,</p> <p>22 right?</p> <p>23 MR. OXFORD: Objection. Asked and</p> <p>24 answered.</p> <p>25 A I really don't have an answer to</p>